IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

RICHARD FELTZ and ASHTON LEE)	
DENNIS, on behalf of themselves and)	
all others similarly situated,)	
)	
Plaintiffs,)	
)	
VS.)	Case No. 18-cv-00298-CVE-JFJ
)	
TULSA COUNTY, et al.)	
)	
Defendants.)	

UNOPPOSED APPLICATION FOR EXTENSION OF TIME BY DEFENDANT STATE JUDGES

Defendant State Judges William LaFortune, ¹ in his official capacity as Presiding Judge, and originally named Special Judges Tammy Bruce, Stephen R. Clark, Theresa Dreiling, Owen Evens, James W. Keeley, Deborah Ludi-Leitch, J. Anthony Miller, Kirsten Pace, April Siebert; substituted Special Judges Julie Doss, Mary Ann Godsby, David Guten, Anne Keele, Charles Morrison, Tanya Wilson; and newly added Special Judges William Hiddle, Wilma Palmer and Rodney Sparkman, all in their official capacity as Special Judges, by and through the undersigned counsel, respectfully apply for an additional two weeks in which to file their responsive pleadings to Plaintiffs' Second Amended Complaint [Doc. 259]. In support of this application, Defendant State Judges would show the Court of the following:

1. Defendants' Response to Plaintiff's Second Amended Complaint is currently due on March 17, 2021.

¹ Judge LaFortune became presiding judge on January 1, 2020 and was automatically substituted for Judge Musseman pursuant to Fed. R. Civ. P. 25(d); however, all references will be to Judge Musseman when discussing events that happened between January 1, 2018 and December 31, 2019 as Judge Musseman was the presiding judge during that time period and the allegations in the Second Amended Complaint refer to his personal actions.

2. No Summons have been issued for newly added (non-substituted) Special Judges William Hiddle, Wilma Palmer, or Rodney Sparkman. These newly added Defendants have not been served and Plaintiffs have not sought wavier of service.

3. Newly added Defendants have agreed to allow undersigned to accept service on their behalf, should service be attempted.

4. Efficiency considerations and judicial economy are served if all judicial defendants have the same response date.

5. The Litigation Division of the Oklahoma Attorney General's Office has been working remotely and needs additional time to properly respond to Plaintiff's allegations.

6. Counsel for Plaintiffs and counsel for the Tulsa County Defendants have no objection to a two-week extension, or until March 31, 2021, for Defendant State Judges to file their responsive pleading.

WHEREFORE, Defendant State Judges respectfully request an additional two weeks, or until March 31, 2021, to file their Answer or other responsive pleading to Plaintiffs' Second Amended Complaint.

Respectfully submitted,

s/ Stefanie E. Lawson

STEFANIE E. LAWSON, OBA #22422 ERIN M. MOORE, OBA #20787 DEVAN A. PEDERSON, OBA # 16576

Assistant Attorneys General Oklahoma Attorney General's Office 313 NE 21st Street Oklahoma City, OK 73105

Telephone: (405) 521-3921 Facsimile: (405) 521-4518

Email: stefanie.lawson@oag.ok.gov erin.moore@oag.ok.gov devan.pederson@oag.ok.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 10^{th} day of March, 2021, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and I further certify that on this date a true and correct copy of the foregoing was served on following who are ECF registrants:

Kristina Saleh Hayley Horowitz Phoebe Kasdin Still She Rises, Tulsa 567 E. 36th Street North Tulsa, OK 74106 kristinas@stillsherises.org hayleyh@stillsherises.org phoebek@stillsherises.org Attorneys for Plaintiff

Allison Holt Ryan
Michelle Kisloff
Gary Yeung
Hogan Lovells US LLP
555 Thirteenth Street, NW
Washington, DC 20004
allison.holt-ryan@hoganlovells.com
michelle.kisloff@hoganlovells.com
gary.yeung@hoganlovells.com
Attorneys for Plaintiff

Douglas Allen Wilson
DA Office Tulsa-900
500 S Denver Ave Ste 900
Tulsa, OK 74103-3832
Attorney for Defendant Regaldo and
Board of County Comm of County of Tulsa

Alexandria Twinem
Ryan Downer
Civil Rights Corps
1601 Connecticut Ave. NW, Suite 800
Washington, DC 20009
alexandria@civilrightscorps.org
ryan@civilrightscorps.org
alexandria@civilrightscorps.org
Attorneys for Plaintiff

Vassi Iliadis Hogan Lovells US LLP 1999 Avenue or the Arts, Suite 1400 Los Angeles, CA 90067 vassi.iliadis@hoganlovells.com Attorney for Plaintiff

Jeb Joseph Oklahoma Attorney General's Office 313 NE 21st Street Oklahoma City, OK 73105 Jeb.Joseph@oag.ok.gov Attorney for Non-party Jari Askins

s/ Stefanie E. Lawson
Stefanie E. Lawson